

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

KATIE FONDREN CARSON, as Administratrix
of the Estate of Brian Christopher Ray, ET AL.

PLAINTIFFS

VERSUS

NO. 3:23CV3063-HTW-LGI

RANKIN COUNTY, MISSISSIPPI, ET AL.

DEFENDANTS

MOTION FOR EXTENSION OF TIME TO RESPOND TO
MOTION [DOC. 14] FOR SUMMARY JUDGMENT AND
MOTION [DOC. 16] FOR JUDGMENT ON THE PLEADINGS

COME NOW the Plaintiffs, by and through counsel of record, and file their Motion for Extension of Time to Respond to Motion [Doc. 14] for Summary Judgment and Motion [Doc. 16] for Judgment on the Pleadings. For cause, the Plaintiffs show the Court as follows:

1. The individual defendants filed a motion for summary judgment premised on qualified immunity, and the municipal defendant filed a motion for judgment on the pleadings, on May 10, 2024.

2. The Plaintiffs' response to the Municipal Defendants' motion is due to be filed on March 21, 2025.

3. Counsel for plaintiffs has been unable, to date, to review all of the authorities and complete all of the necessary research for a proper and complete presentation of this case to the Court.

4. Counsel for the plaintiffs is scheduled to chair a meeting of the Committee for

Professional Responsibility on March 21, 2025 which poses a hindrance to a filing the response to the motions by the deadline.

5. Accordingly, the Plaintiffs request an extension of time, until March 26, 2025, to serve their response in opposition to the defendants' motions.

6. This motion is not being submitted for purposes of delay or harassment but to further the ends of justice.

7. The defendants will not be prejudiced by the Court granting this requested extension of time.

8. Counsel for the Plaintiffs has contacted and conferred with counsel for the defendants regarding this motion and the relief requested and has been advised that there is no objection to this motion or the relief requested.

9. Because this motion is self-explanatory, the Plaintiffs request to be relieved from the obligation of filing a supporting memorandum of authorities.

WHEREFORE, PREMISES CONSIDERED, the Plaintiffs respectfully request the Court sustain this Motion for Extension of Time to Respond to Motion [Doc. 14] for Summary Judgment and Motion [Doc. 16] for Judgment on the Pleadings and extend the time for them to file their response to the motion until on or before March 24, 2025.

Respectfully submitted, this the 21st day of March, 2025.

/s/ Victor Israel Fleitas

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CERTIFICATE OF SERVICE

I hereby certify that on March 21, 2024 I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

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This the 21st day of March, 2025.

/s/ Victor Israel Fleitas

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